

December 18, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.



CLARKE MOSQUITO CONTROL PRODUCTS, INC.

159 Garden Ave. • P.O. Box 72197 • Roselle, IL 60172

03/OPP # 34147A
2PP

November 16, 1998

Ms. Margaret Rice
1921 Jefferson Davis Highway
Crystall Mall #2
Arlington, VA 22202

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Dear Ms. Rice:

This letter is in response to the Agency's request for registration comments on errors, confidential business information (CBI), and planned data only for Temephos as it relates to the EFED Chapter for the Reregistration Eligibility Decision (RED) Document.

The following is our response on factual errors only that do not pertain to matters of policy, interpretation, or applicability of data. Our review includes but is not limited to mathematical, computational, typographical or other similar errors.

After review of the above-mentioned chapter, we find the following errors.

- Page 1, Memorandum Introductory Paragraph. The second sentence of the second paragraph contains two typographical errors. Suggested wording: "They no longer wish to market the chemical as an insecticide, but have licensed Clarke Mosquito Control Products company to register it."
- Page 2, Memorandum Introductory Paragraph. The fourth sentence of the first paragraph contains a capitalization error. Suggested wording: "In September 1997 these registrations were transferred to Clarke Mosquito Control Product, Inc (as 8329-56, -57, -58, -59, and -60 respectively)."
- Page 6, Studies that may be waived for Temephos under certain conditions. Guideline "72-3(c)" contains a typographical error.
- Page 7, Memorandum Suggestions/Risk Mitigation Measures Proposed by EFED. The second paragraph contains a typographical error. Suggested wording: "Temephos is used primarily by POCs working for or contracted to governmental organizations."
- Page 10, Chapter Body Environmental Risk Assessment. The final sentence of this section contains awkward wording. Suggested wording: "Therefore,

the assessment which follows is an ecological risk assessment based on an inadequate data set for the generation of a RED.”

- Page 11, Use Characterization. The summary of application rates for sites including “standing water, shallow ponds, swamps, marshes, catch basins, and similar areas where mosquitoes breed.” contains a typographical error in application rate. The actual labeled application rate is 2 ½-5 lb/A 2%G (0.05–0.1 lb ai/A).
- Page 14, Environmental Fate Assessment. The first sentence of the first complete paragraph contains a typographical error. Suggested wording: “Three unidentified degradates (A, B, and C) at greater than 10% of the applied...”
- Page 25, Estuarine and Marine Fish, Chronic. The third paragraph contains a grammatical error. Suggested wording: “An estuarine/marine fish life-cycle study using the TGAI is required for Temephos. The preferred test species is sheepshead minnow.”
- Page 30, Exposure and risk to nontarget terrestrial animals, Acute exposure and risk. The final two sentences of the first complete paragraph contain awkward wording. Suggested wording: “Since long-term, cumulative concentration of Temephos in an aquatic ecosystem does not allow assessment of residues potentially taken-up at levels that these organisms can be exposed to assist aquatic bioaccumulation data, the risks to piscivores are based on BCF values which may be an underestimation of risks to piscivorous species.”
- Page 31, Exposure and risk to nontarget terrestrial animals, Reproductive risk to nontarget terrestrial animals. The first sentence of this section contains a typographical omission of the word “to.” Suggested wording: “Birds are expected to be exposed to Temephos during the breeding season.”
- Page 31, Exposure and Risk to Estuarine and Marine Animals. The second sentence of this section contains a typographical error. Suggested wording: “Acute and chronic data are not available for marine/estuarine fish.”

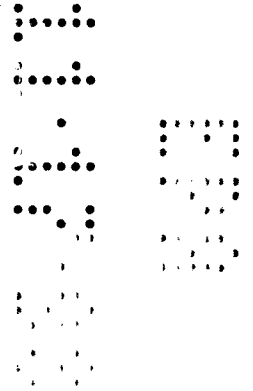
No claim of confidentiality is made for any information contained within this Chapter on the basis of its falling within the scope of FIFRA section 10(d)(1)(A), (B), or (C).

Thank you.

Sincerely,



Karen J. Larson
Regulatory Affairs Specialist



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